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Guidelines for the Storage and Administration of Medications in Camps

This document interprets the requirements for the storage and administration of medications in recreational camps for children in Massachusetts (105 CMR 430.159 and 105 CMR 430.160), including the roles of the health care consultant (“consultant”) and health supervisor (“supervisor”).

Each recreational camp is required to:

- develop and implement written procedures for medication administration as part of the health care policy
- obtain written permission from the parent/guardian to administer medication to a camper
- provide for secure storage of refrigerated and unrefrigerated medication
- provide a health care consultant: a physician, nurse practitioner or physician assistant with pediatric training licensed to practice in the Commonwealth of Massachusetts
- provide a health supervisor: at minimum, an individual, at least 18 years of age, specially trained in first aid (at least current American Red Cross Standard First Aid certification or its equivalent) and CPR
- provide a physician, physician’s assistant, registered or practical nurse or a nurse practitioner at camps:
 - for the physically and/or mentally handicapped;
 - medical specialty camps; and
 - residential camps where the number of staff and campers totals 150 or greater

Medication Administration and the Americans with Disabilities Act

Compliance with the Americans with Disability Act (ADA) requires that all children be given equal access to recreational camps. Therefore, a recreational camp that refuses admission of a camper based on a camper’s need to take medication, has a no medications policy, or refuses to accommodate a disabled camper requiring medication administration may be in violation of the ADA.

For more information regarding ADA compliance, please contact the United States Department of Justice at 1-800-514-0301 (voice) or 1-800-514-0383 (TDD) or visit their website at www.usdoj.gov.

Duties and Responsibilities of the Health Care Consultant

The Health Care Consultant must:

1. Be available for consultation at all times (if the consultant is not available, appropriate professional coverage for the consultant is sufficient, provided that all necessary arrangements are made, and the camp is informed that there will be substitute coverage).
2. Develop and oversee a written policy for the storage of medications at the camp. This must include the designated secure locations where refrigerated and unrefrigerated medication will be stored. The policy must also contain procedures for ensuring proper storage conditions for medications, including the use of thermometers to monitor the temperature of refrigerated medications.
3. Develop and oversee a written policy for the administration of medications at the camp. This policy must identify the individuals who will administer medications. These may include:
 - (a) Individuals authorized by scope of practice (such as nurses) to administer medications; and/or
 - (b) Other individuals qualified as health supervisors who administer medications with the oversight of the health care consultant. These individuals must be trained by the consultant to administer oral or topical medications only. The following circumstance may be an exception:
 - The Health Care Consultant may make an exception for the health supervisor to use an Epi-pen[®] for a camper with a known allergy or pre-existing medical condition, for whom the Epi-pen[®] has been prescribed. The health supervisor must demonstrate the capability to use an Epi-pen and written approval of a camper's parent/guardian and the Health Care Consultant must be given.
 - (c) Campers may be allowed to do the following self-medication:
 - If a child is capable of self-medicating using a prescribed Epi-pen[®] or inhaler and the parent/guardian and the camp health care consultant give written approval, the camper may be allowed to carry these devices with him/her at all times in order to self-administer when necessary.
 - If a diabetic child requires his/her blood sugar be monitored, or requires insulin injections and the parent/guardian and the camp health care consultant give written approval, the camper, who is capable, may be allowed to self-monitor and/or self-inject him/herself. Blood monitoring activities and self-injection must take place in the presence of the Health Supervisor. The camp must dispose of any hypodermic needles and syringes in accordance with 105 CMR 480.000: Storage and Disposal of Infectious or Physically Dangerous Medical or Biological Waste.
4. Develop and oversee a procedure for the off-site administration of medication. The Health Care Consultant must ensure that the following guidelines are followed when a camper who requires prescribed medication travels on an outing with the camp organization away from the home base of the camp:

- a) Prescribed medication must **always** be kept in an original pharmacy container. Repackaging of medication and intermediary or substitute containers are **NOT** allowed.
 - b) Medication must be taken from an original container and administered directly to the child by a licensed health care professional or when appropriate, a health supervisor authorized by the health care consultant to administer prescription medication. Camp personnel cannot transfer medications from one bottle to another.
 - c) To ensure repackaging does not occur:
 - The original prescription container can be taken from the camp base as long as the medication remains in a locked case, in the possession of the licensed health care professional or health supervisor until return to the home base of the camp.
 - The camp operator can require that parents supply the camp with two (2) original prescription containers for each type of prescription medication necessary for their child. Each container would have an allotment of medication that would allow one container of medication to remain at the camp base and the second bottle to travel securely as described in the bullet above.
5. If medication is dispensed by a pharmacy in customized packaging (e.g., different medications packaged together for one patient in a sealed unit for administration together), ensure that all relevant staff are appropriately trained in the management and utilization of such packaging. The camp should verify with the pharmacy that such customized packaging meets DPH/Board of Registration in Pharmacy requirements for packaging and labeling.
6. Determine the safety of medication administration by designated and appropriately trained supervisors.
7. Develop and provide medication administration training and appropriate oversight to selected supervisors¹ including, but not limited to, documentation of the training and competency of each health supervisor trained and designated to administer medication.
8. Develop a procedure to ensure positive identification of each camper who is to receive medication.
9. Provide professional oversight to ensure that appropriate procedures are in place for the safe storage, administration and record keeping of medications. The medical log described at 105 CMR 430.155 is required for tracking health complaints and treatment, including, medication administration; however, DPH strongly recommends keeping a separate log sheet for medication administered in the camp (sample attached).

¹ Consultants shall be responsible for the training and professional oversight described herein only for those individuals included under category 2(b) of page 1 above, not for individuals authorized by scope of practice to administer medications.

10. Provide guidelines for medication administration and the circumstances under which the health care consultant and/or parent/guardian must be notified. These should include mechanisms for timely notification of a parent/guardian when medication was not administered in accordance with the prescription (e.g., medication not available; missed dose; dose refused).
11. Assure that a health supervisor is on staff and present when necessary for storage and administration of each medication. Review the potential side effects, adverse reactions and other pertinent information with all health supervisors administering medications.
12. Review all documentation relating to medication administration at the beginning of each camp session and as often as necessary. The Health Care Consultant must ensure that written permission from the parent/guardian has been obtained for a camper needing medication.
13. Sign a list of the medications that will be administered at camp.

Duties and Responsibilities of Health Supervisors Trained and Eligible to Administer Medications

1. Demonstrate safe handling and proper storage of medication.
2. Demonstrate the ability to administer medication properly.
 - accurately read and interpret the medication label
 - follow the directions on the medication label correctly
 - accurately identify the camper for whom the medication is ordered
3. Demonstrate the appropriate and correct record keeping regarding medications given and/or self-administered.
4. Demonstrate correct and accurate notations on the record if medications are not taken/given either by refusal or omission and when adverse reactions occur.
5. Describe the proper action to be taken if:
 - medications are not taken/given either by refusal or omission
 - any error is made
 - there are adverse reactions
6. Use resources appropriately, including Health Care Consultant, parent/guardian or emergency services when problems arise.
7. Understand and be able to implement:
 - Emergency plans
 - 911 access
8. Describe appropriate behaviors that assure confidentiality.

Delivery of Medications

1. The health supervisor or a licensed health care professional may accept delivery of prescription medications from a parent/guardian.
2. The health supervisor or a licensed health care professional may pick up prescription medications from a licensed community pharmacy upon the written authorization of the parent/guardian.
3. A camp may not arrange for or accept delivery of prescription medications directly from a pharmacy, except in the case in which only licensed health care professionals receive, manage and administer medications to campers. If prescription medications are to be delivered to such a camp by a licensed pharmacy:
 - a. only a licensed health care professional may accept delivery from the licensed pharmacy;
 - b. the camp must obtain written authorization for such delivery from the parent/guardian; and
 - c. the camp should ensure that all entities involved in the transaction are HIPAA compliant.
4. Regardless of the mode of delivery, medications must be delivered and maintained at all times in the original container as dispensed by the licensed pharmacy. All packaging and labeling should be in accordance with guidelines of the U.S. Pharmacopoeia (USP).